



July 6, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Communication, GN Docket Nos. 17-183, 18-122

Dear Ms. Dortch:

On July 5, Robert Weller, Patrick McFadden and the undersigned, all of the National Association of Broadcasters (NAB), met with Rachael Bender and Nicholas Degani of Chairman Pai's office. During this meeting, NAB discussed the draft Notice of Proposed Rulemaking and Order in the above-referenced docket.

NAB urged the Commission to seek comment on the additional information collection regarding the operation of receive-only earth stations set forth in the draft Order. The additional detailed information the Commission seeks may be of little or no use depending on the Commission's ultimate decisions on proposals set forth in the Notice of Proposed Rulemaking. For example, in the event the Commission elected to maintain its full-band, full-arc licensing policy, or if the Commission elected to reallocate a fixed amount of nationwide spectrum for wireless use and not allow shared use in the remainder of the band, virtually all of the additional information requested would be unnecessary. Accordingly, it would be premature to order the additional information collection before the Commission knows what specific elements of the collection, if any, will actually be required.

At a minimum, we urge the Commission to consider limiting this burdensome and potentially unnecessary information collection by confining the collection, at least as an initial matter, to the top-25 media markets. Confining the initial collection in this manner will allow the Commission to obtain information about earth station use in those markets that are most likely to be of interest to wireless carriers while not unnecessarily burdening small and rural users.

NAB also discussed its ongoing concern that small and rural users may not be aware of the need to register their earth stations during the filing window. NAB appreciates the efforts the

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International Bureau has made to ease the registration burden by extending the filing window and providing fee relief.¹ Nevertheless, many small operators may be unaware of the filing window and the consequences to their operations for failing to register. Given the tremendous potential for disruption in the event the Commission fails to protect incumbent C-band operations we urge the Commission to take proactive steps to increase awareness of the need to register. We look forward to working constructively with the Commission in this regard.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Rick Kaplan', with a long horizontal line extending from the end of the signature.

Rick Kaplan
General Counsel and Executive Vice President,
Legal and Regulatory Affairs
National Association of Broadcasters

cc: Rachael Bender
Nicholas Degani

¹ *International Bureau Announces 90-day Extension of Filing Window, to October 17, 2018, to File Applications for Earth Stations Currently Operating in the 3.7-4.2 GHz Band*, Public Notice, GN Docket Nos. 17-183, 18-122, DA 18-639 (June 21, 2018).